

In the
United States District Court
For the
Eastern District of Wisconsin

Estate of Le'Quon J. McCoy,
By Special Administrator
Antoinette L. Broomfield,
Antoinette L. Broomfield as the assignee
of the claims of Latredriana N. McCoy,
and Antoinette L. Broomfield, on her own behalf,

Plaintiffs,

v.

Case No. 2:22-cv-320

The City of Milwaukee, Wisconsin,
And, in their Individual Capacities,
Jose Flores, Nikolas Zens, David Michaels,
and Douglas Pavlik,

Defendants.

Supplement to Expert Report of Scott DeFoe

The undersigned Scott DeFoe hereby supplements his expert report in this case
as follows:

I have now received and reviewed materials that I have been given to
understand were not in the hands of Plaintiffs' counsel, or did not exist, when I

prepared my initial report. These materials include:

- The depositions of the Defendants and associated exhibits:

Dkt. # 51 Deposition of Defendant Jose Flores.pdf

Dkt. # 51-1 Exhibit 3 - Dalt Incident Report with Defendant Interviews.pdf

Dkt. # 51-2 Exhibit 5 - Martin Report of Interview with Flores.pdf

Dkt. # 51.3 Exhibit 7 • General Order 2019.19.pdf

Dkt. # 52 Deposition of Defendant David Michael.pdf

Dkt. # 52-1 Exhibit 3 - Dalt Incident Report with Defendant Interviews.pdf

Dkt. # 52-2 Exhibit 6 - Thimm Report of Michaels Interview.pdf

Dkt. # 52-3 Exhibit 7 - General Order 2019-19.pdf

Dkt. # 53 Second Deposition of Defendant David Michaels.pdf

Dkt. # 54 Deposition of Defendant Douglas Pavlik.pdf

Dkt. # 54-1 Exhibit 3 - Doll Incident Report with Defendant Interviews.pdf

Dkt. # 54-2 Exhibit 7 - General Order 2019-19.pdf

Dkt. # 54-3 Exhibit 9 - Johnson Report of Interview with Pavlik.pdf

Dkt. # 55 Deposition of Defendant Nikolas Zens.pdf

Dkt. # 55-1 Exhibit 1 - CAD Log.pdf

Dkt. # 55-2 Exhibit 2 - Crash Report.pdf

Dkt. # 55-3 Exhibit 7 - General Order 2019-19.pdf

Dkt. # 55-4 Exhibit 8 - Injuries in Vehicle Pursuits.pdf

Dkt. # 55-5 Exhibit 9 - Johnson Report of Pavlik Interview.pdf

Dkt. # 55-6 Exhibit 10 - Johnson Report of Zens Interview.pdf

- The Defendants' more recent discovery responses attached to Olson Declaration dkt. # 62:

Dkt. # 62 Declaration of Jeff Scott Olson

Dkt. # 62 -1 Exhibits 31-41 Pursuit Policy Exhibits

Dkt. # 62-2 Exhibit 42 - Highlighted Injury Data

Dkt. # 62-3 Exhibit 43 - Defendants' Initial Responses to Plaintiffs'

Second Discovery Requests

Dkt. # 62-4 Exhibit 43 - Defendants' Amended Responses to Plaintiffs'

Second Discovery Requests

- The videos recorded by the Defendants during their pursuit of Le'Quon McCoy;

Dkt. # 18-7 - Exhibit A-1 - Flores Video

Dkt. # 18-7 - Exhibit A-2 - Zens Video

Dkt. # 18-7 - Exhibit A-3 - Michaels Video

Dkt. # 18-7 - Exhibit A-4 - Pavlik Video

After reviewing these supplemental materials, none of the opinions in my original report have changed. These materials have only strengthened those opinions.

Dated this January 25, 2024

SA DeFoe
Scott DeFoe